

1 Gregory J. Yu (State Bar No. 133955)
GLOBAL LAW GROUP
2 2015 Pioneer Court, Suite P-1
San Mateo, CA 94403
3 Telephone: (650) 570-4140
Facsimile: (650) 570-4142
4 E-mail: glgroup [at] inreach [dot] com

5 Attorney for Plaintiffs and Proposed Class and Subclasses

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 KINDERSTART.COM LLC, a California
12 limited liability company, on behalf of itself and
all others similarly situated,

13 Plaintiffs,

14 v.

15 GOOGLE, INC., a Delaware corporation,
16 Defendant.

Case No. C 06-2057 JF

**DECLARATION OF VICTOR B.
GOODMAN IN SUPPORT OF
OPPOSITION TO DEFENDANT'S
SPECIAL MOTION TO STRIKE
PURSUANT TO CCP § 425.16**

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18 I, VICTOR B. GOODMAN, HEREBY DECLARE AS FOLLOWS:

19 1. My name is Victor B. Goodman. This Declaration is based upon my personal
20 knowledge and, where noted, on information and belief following a review of relevant business
21 records or independent investigation, or both, as the case may be regarding the matters set forth
22 below.

23 2. I am member and a manager of KinderStart.com LLC, a California limited
24 liability company ("KinderStart"), which is headquartered in Norwalk, California.

25 3. After KS.com was launched in 2000, by 2005 Google searches by visitors became
26 the largest source of our referrals and a vital, essential channel of exposure of KinderStart to the
27 Internet. KinderStart does not own and operate a separate physical location to the outside world.
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DECLARATION OF VICTOR B. GOODMAN RE
OPPOSITION TO DEFENDANT'S SPECIAL
MOTION

- 1 -

Case No. C 06-2057 JF

1 4. After KS.com was abruptly and intentionally removed from Google's Web Index
2 on March 19, 2005 or later, its PageRank sank to '0' and did not rise for the rest of 2005. Over
3 the next several months, the monthly traffic of visitors to KS.com fell by 70% and the monthly
4 revenue from KinderStart's participation in the AdSense program fell by 80%.

5 5. In the history of KinderStart and KS.com, we have not issued any press releases
6 or intentionally sought to put the issues of KS.com's traffic or its PageRank as a matter of public
7 controversy. The only publicity has been the result of our outside attorney and his representation
8 of the class of plaintiffs in this litigation.

9 I DECLARE UNDER PENALTY OF PERJURY, that the above is based on my personal
10 knowledge, and where indicated, upon information and belief.

11 Executed on this 8 day of June, 2006 in Los Angeles, California.

12
13 By: 
14 VICTOR B. GOODMAN
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